

June 29, 2013

Mark Braunstein WA4KFZ
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Federal Communication Commission
RE: request for rule-making, RM-11699

Dear Sir/Madam:

In response to RM-11699, I would ask that the FCC not permit the use of encryption technology for purposes of securing the content of messages sent via amateur radio. While basic encryption is used to secure satellite telecommands (thereby preventing damage to irretrievable equipment or being usurped by unauthorized individuals anywhere in the world), the argument that encryption is required to secure HIPAA patient information is not a sufficient reason for the rule making change.

Alternate methods of protecting the privacy of patient information can be employed. For example, runners in the Marine Corp Marathon sign a waiver with regards to the exchange of medical information over unsecure networks (e.g., amateur radio). Runners are identified solely by their bib number, and only general descriptions of persons are used to describe the individual prior to their arrival at a shelter or treatment by first responders. If emergency organizations wish to obfuscate the contents of their inventory, needs at shelters, etc., this could similarly be addressed by procedural means using currently available unencrypted voice and data communications.

The request cites the opinion of the submitter alone. To the best of my knowledge, none of the major emergency services organizations (Red Cross, Salvation Army, etc.) have requested this capability or indicated that they would cease using amateur radio to augment their operation unless encryption was employed.

Additionally, I am concerned that the permitted use of encryption could be misused by unscrupulous operators in passing pornography or other data that could potentially be related to criminal activity. A few cases of abuse or misuse of encryption would severely stain the reputation of amateur radio as a service for the public good.

Finally, I would suggest that the use of encryption technology would ultimately run afoul of the treaties and agreements that the United States and, by extension, US amateur radio operators enjoy with other operators in foreign countries. In light of the recent revelation that the NSA has the capability, and is in the process of monitoring voice and data traffic, the use of encryption by US-based operators would ultimately add to the suspicion that US-based amateur radio operators could no longer be trusted to engage in free and open dialog with others around the world. This would add a chilling effect to a service specifically intended to foster international goodwill.

In conclusion, I ask that the FCC decline this proposed rule making suggestion and instead keep amateur operation the same as it is today.

Regards,

Mark Braunstein WA4KFZ